

1 CLARK COUNTY SCHOOL DISTRICT  
2 OFFICE OF THE GENERAL COUNSEL  
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8 **UNITED STATES DISTRICT COURT**  
9  
10 **DISTRICT OF NEVADA**

11 JILL LEFF, CLAUDIA KRAUSE, KRISTA  
12 SHIELDS, CHRISTOPHER STEWART,  
NEKISHA SIMPSON, CARRIE CHAPPELL,  
13 CAROLYN DOYEL, KODZO ATTILA,  
JOSEPH PORTILLA, AMANDA LA FORTE,  
PATRICIA WEBB, MARY RICE, BARBARA  
14 GAMMAGE, FRANCIS SIMONE BOJAR,  
GLEN ROWLEY, and CLARK COUNTY  
EDUCATION ASSOCIATION, an employee  
15 organization,

16 Plaintiffs,

17 v.

18 CLARK COUNTY SCHOOL DISTRICT, a  
county school district

19 Defendant.

20 CASE NO.: 2:15-CV-01155-RFB-GWF

21 **STIPULATION AND ORDER TO**  
**EXTEND TIME TO RESPOND TO**  
**PLAINTIFFS' COMPLAINT**

22 (First Request)

23 COME NOW, Plaintiffs and Defendant Clark County School  
24 District ("District"), by and through their attorneys of record,  
and hereby stipulate and agree that the District may have up to and  
including September 4, 2015, to respond to the complaint in this  
matter. The current response date is August 18, 2015. This is the  
first request for an extension to the response due date.

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26 This matter primarily concerns the constitutionality of  
27 certain amendments to NRS Chapter 391 enacted by the Nevada  
28

1 legislature in 2011. Plaintiffs have served Nevada's Attorney  
2 General with notice pursuant to Fed.R.Civ.P 5.1 that this matter  
3 concerns a constitutional challenge. This request is being entered  
4 in good faith, and not for reason of delay, in order to allow the  
5 parties to determine the State of Nevada's intention with respect  
6 to defending the challenged statutes.

7 THEREFORE, the parties respectfully request that the District  
8 may have up to and including September 4, 2015, to respond to the  
9 complaint in this matter.

10 DATED this 29<sup>th</sup> day of July, 2015.

11  
12 CLARK COUNTY SCHOOL DISTRICT  
13 Office of the General Counsel

DYER, LAWRENCE, FLAHERTY,  
DONALDSON AND PRUNTY  
Attorneys at Law

14 By: /s/ Jon Okazaki  
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19 Attorneys for Defendants

By: /s/ Thomas J. Donaldson  
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Carson City, NV 89703  
Attorneys for Plaintiffs

20  
21 **IT IS SO ORDERED:**

22 Date: July 30, 2015

  
23 GEORGE FOLEY, JR.  
24 United States Magistrate Judge  
25  
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